# Exhibit A

From: Alexander Miller
To: Andrew Grimm

Cc: Andrew Grimm; Elizabeth Sperling; Shannon Wodnik

Subject: RE: Attorney Conferral - Leavitt v Everi / Central

**Date:** Friday, March 8, 2024 2:54:00 PM

Attachments: image001.png

image002.png image003.png image004.jpg image005.png image006.jpg

Thank you, Andrew. Appreciate the call and look forward to discussing further next Thursday. I'll circulate a dial in shortly.

Best, Alex

?

## **Alexander Miller**

ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP 600 West Broadway, Suite 1080

San Diego, CA 92101 glaserweil.com

amiller@glaserweil.com **T** 619.762.5952

#### To send files securely, please click here

This message and any attached documents may contain information from the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP that is confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Andrew Grimm <andrew.b.grimm@gmail.com>

Sent: Friday, March 8, 2024 2:51 PM

To: Alexander Miller <amiller@glaserweil.com>

Cc: Andrew Grimm <andrew@digitaljusticefoundation.org>; Elizabeth Sperling <esperling@glaserweil.com>; Shannon

Wodnik <swodnik@grsm.com>

Subject: Re: Attorney Conferral - Leavitt v Everi / Central

Alex.

My minutes as to next steps from our meeting:

- 1. I'm going to read some case law on 15 U.S.C. 1681*i*. You can send me any that you think are highly pertinent to read, but this is not necessary.
- 2. Then I'm going to advise my client about the case law as well as get a further sense of his perspective on the matter.
- 3. You are planning get a better sense of the details of your client's investigation into the disputed debt in detail.
- 4. Then, we will touch base next Thursday, March 14, 2024, at 3pm.
- 5. Both sides don't think mediation makes sense at this time, but neither side is ruling it out if we think there is a basis to do so later.
- 6. If clarifying the law and the facts takes longer than expected, I have no problem with

further extensions as we clarify our positions.

Best regards,

Andrew Grimm
Attorney
Digital Justice Foundation
(531) 210-2381

digitaljusticefoundation.org

Email: andrew@digitaljusticefoundation.org

On Fri, Mar 8, 2024 at 2:09 PM Andrew Grimm < andrew.b.grimm@gmail.com > wrote:

Alex,

Sorry. I blanked. Dialing in right now.

Best regards,

Andrew Grimm Attorney Digital Justice Foundation (531) 210-2381

digitaljusticefoundation.org

Email: andrew@digitaljusticefoundation.org

On Fri, Mar 8, 2024 at 2:08 PM Alexander Miller <a href="miller@glaserweil.com">amiller@glaserweil.com</a> wrote:

Hi Andrew,

Just checking in to see if you are still available to meet and confer. I've copied the dial in information below if helpful.

Best,

Alex

Microsoft Teams meeting

Join on your computer, mobile app or room device

Click here to join the meeting Meeting ID: 253 002 592 15

Passcode: MsyFjw

Download Teams | Join on the web



**Alexander Miller** 

ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP 600 West Broadway, Suite 1080 San Diego, CA 92101 glaserweil.com amiller@glaserweil.com
T 619.762.5952

#### To send files securely, please click here

This message and any attached documents may contain information from the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP that is confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Alexander Miller

Sent: Tuesday, March 5, 2024 4:48 PM

To: Andrew Grimm <andrew.b.grimm@gmail.com>

Cc: Andrew Grimm <andrew@digitaljusticefoundation.org>; Elizabeth Sperling <esperling@glaserweil.com>;

Shannon Wodnik < swodnik@grsm.com >

Subject: RE: Attorney Conferral - Leavitt v Everi / Central

Thank you, Andrew. Friday at 2 p.m. PT works for us. I'll circulate a calendar invite, and we'll also file the updated joint stipulation to substitute Credit Central.

Best,

Alex



## **Alexander Miller**

**ASSOCIATE** 

Glaser Weil Fink Howard Jordan & Shapiro LLP 600 West Broadway, Suite 1080 San Diego, CA 92101 glaserweil.com

amiller@glaserweil.com
T 619.762.5952

### To send files securely, please click here

This message and any attached documents may contain information from the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP that is confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Andrew Grimm <andrew.b.grimm@gmail.com>

Sent: Tuesday, March 5, 2024 1:30 AM

To: Alexander Miller <a miller@glaserweil.com>

Cc: Andrew Grimm <andrew@digitaljusticefoundation.org>; Elizabeth Sperling <asperling@glaserweil.com>;

Shannon Wodnik < swodnik@grsm.com >

Subject: Re: Attorney Conferral - Leavitt v Everi / Central

Alex,

Thanks for sending over the updates. Your proposed edits on the joint stipulation to substitute Central for Everi work for me. You may affix my e-signature and file the joint stipulation.

As for our meet and confer, how about Friday, March 8, 2024, at 2pm Pacific time?

Best regards,

Andrew Grimm
Attorney
Digital Justice Foundation
(531) 210-2381

digitaljusticefoundation.org

Email: andrew@digitaljusticefoundation.org

On Mon, Mar 4, 2024 at 11:11 PM Alexander Miller <a href="miller@glaserweil.com">amiller@glaserweil.com</a> wrote:

Thanks Andrew. We went ahead and filed the stipulation to extend Defendant's time to respond.

Regarding the stipulation to dismiss Everi and name Central Credit as a defendant, as set forth in the attached we propose carrying over your suggested edits into the proposed order along with a couple of additional tweaks to make it clear that all references to Everi in the initial complaint should be references to Central Credit. Please let us know if you agree.

As of now we're free to meet and confer on Friday afternoon to present our positions and let you consider further. Please let us know if there is a time that works best for you.

Best,

Alex



## **Alexander Miller**

ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP 600 West Broadway, Suite 1080 San Diego, CA 92101 glaserweil.com amiller@glaserweil.com T 619.762.5952

#### To send files securely, please click here

This message and any attached documents may contain information from the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP that is confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Andrew Grimm <andrew.b.grimm@gmail.com>

Sent: Monday, March 4, 2024 12:24 PM

To: Alexander Miller <a miller@glaserweil.com>

Cc: Andrew Grimm <andrew@digitaljusticefoundation.org>; Elizabeth Sperling <esperling@glaserweil.com>;

Shannon Wodnik < swodnik@grsm.com >

Subject: Re: Attorney Conferral - Leavitt v Everi / Central

<u>Alex</u>, the stipulation to extend Defendant's time to respond is fine to file as is, with my affixed e-signature. I have a proposed edit to the stipulation regarding the named defendant, which is attached in track changes, and if that's fine with your team then you may accept the proposed edit, include my e-signature, and file as well.

<u>Shannon</u>, nice to meet you over email. I'm looking forward to working with you on this matter and getting to know you. I hope it's an interesting and enjoyable case for you.

As for the meet and confer, I've done this two different ways. Sometimes, defense counsel want to present their views and then I digest them, do some research, do some further investigation, talk to my client and then we touch base again. Alternatively, sometimes defense counsel prefer I come with some preparation to talk through an issue. Happy to do either, but it affects scheduling on my end since I won't have a lot of time this week to do in-depth research. Accordingly, I'd prefer to do the meeting earlier if it's mostly me listening to keep things moving. If you want me to come with some preparation to engage on a legal issue or issues, let me know what they are and let's schedule it for early next week. Does that work? Or were you envisioning something else?

Best regards,

Andrew Grimm Attorney Digital Justice Foundation (531) 210-2381

digitaljusticefoundation.org

Email: andrew@digitaljusticefoundation.org

On Mon, Mar 4, 2024 at 11:28 AM Alexander Miller <a href="miller@glaserweil.com">amiller@glaserweil.com</a>> wrote:

Hi Andrew,

Following up on the emails below, attached please find draft stipulations and proposed orders to: (1) dismiss Everi Holdings and name Central Credit LLC as a defendant instead; and (2) extend the time for Defendant to respond to the complaint by 30 days.

By way of this email, I would also like to introduce you to our local counsel Shannon Wodnik who will be working with us on this matter. Please let us know if you have any comments or edits on the draft stipulations, and if not, whether we may affix your e-signature for filing.

Separately, we would also like to set a time to meet and confer further on the merits and our anticipated motion to dismiss. Do you have availability Thursday or Friday this week or early next week to discuss?

Thank you, Alex



# **Alexander Miller**

ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP 600 West Broadway, Suite 1080 San Diego, CA 92101 amiller@glaserweil.com T 619.762.5952